

## Legislative Audit Division

State of Montana



Report to the Legislature

January 1998

### Performance Audit Follow-up

## Big Game Drawing System

Department of Fish, Wildlife and Parks

The original audit report contained 16 recommendations to improve drawing operations. Recommendations related to:

- ▶ Improving compliance procedures.
- ▶ Bettering program administration.
- ▶ Strengthening general and application controls.

PLEASE RETURN

STATE DOCUMENTS COLLECTION

JUN 2 1998

MONTANA STATE LIBRARY  
1515 E. 3<sup>RD</sup> AVE.  
HELENA, MONTANA 59620

Direct comments/inquiries to:  
Legislative Audit Division  
Room 135, State Capitol  
PO Box 201705  
Helena MT 59620-1705

97SP-77

NOV 7 2002



## PERFORMANCE AUDITS

Performance audits conducted by the Legislative Audit Division are designed to assess state government operations. From the audit work, a determination is made as to whether agencies and programs are accomplishing their purposes, and whether they can do so with greater efficiency and economy. In performing the audit work, the audit staff uses audit standards set forth by the United States General Accounting Office.

Members of the performance audit staff hold degrees in disciplines appropriate to the audit process. Areas of expertise include business and public administration, statistics, economics, computer science, communications, and engineering.

Performance audits are performed at the request of the Legislative Audit Committee which is a bicameral and bipartisan standing committee of the Montana Legislature. The committee consists of six members of the Senate and six members of the House of Representatives.

### MEMBERS OF THE LEGISLATIVE AUDIT COMMITTEE

Senator Linda Nelson, Chairman  
Senator Sue Bartlett  
Senator Reiny Jabs  
Senator Tom Keating  
Senator Ken Miller  
Senator Fred VanValkenburg

Representative Bruce Simon, Vice Chairman  
Representative Beverly Barnhart  
Representative Ernest Bergsagel  
Representative A. R. "Toni" Hagener  
Representative Bob Keenan  
Representative Robert Pavlovich

# LEGISLATIVE AUDIT DIVISION

Scott A. Seacat, Legislative Auditor  
John W. Northey, Legal Counsel  
Tori Hunthausen, IT & Operations Manager



Deputy Legislative Auditors:  
Jim Pellegrini, Performance Audit  
James Gillett, Financial-Compliance Audit

January 1998

The Legislative Audit Committee  
of the Montana State Legislature

This is our performance audit follow-up of the Big Game Drawing System administered by the Department of Fish, Wildlife and Parks. While some recommendations are not implemented, we found most are implemented or are being implemented. Summary information from the original report is included in Appendix A.

We wish to express our appreciation to the staff of the department for their cooperation and assistance during our follow-up work.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott A. Seacat", written over a horizontal line.

Scott A. Seacat  
Legislative Auditor



Digitized by the Internet Archive  
in 2010 with funding from  
Montana State Library

<http://www.archive.org/details/biggeddrawingsy1998mont>

# **Legislative Audit Division**

---

## **Performance Audit Follow-up**

### **Big Game Drawing System**

**Department Fish, Wildlife and Parks**

Member of the audit staff involved in this audit was Mary Zednick.



## Table of Contents

---

	List of Tables . . . . .	ii
	Administrative Officials . . . . .	iii
<b>Chapter I - Introduction</b>	Introduction . . . . .	1
	Follow-up Results . . . . .	1
<b>Chapter II - Implementa- tion Status</b>	Introduction . . . . .	3
	Procedures Which Ensure Sportsmen Compliance . . . . .	3
	Program Administration . . . . .	4
	Big Game Drawing Process . . . . .	6
	General Controls . . . . .	7
	Application Controls . . . . .	9
<b>Agency Response</b>	Department of Fish, Wildlife and Parks . . . . .	15
<b>Appendix A</b>	1995 Audit Report Summary . . . . .	S-1

## List of Tables

Table 1 Recommendation Status . . . . . Page 1



## **Administrative Officials**

---

**Department of Fish,  
Wildlife and Parks**

Pat Graham, Director

**Administration and  
Finance Division**

Dave Mott, Administrator

**Licensing/Data Processing  
Bureau**

Barney Benkelman, Chief



# Chapter I - Introduction

---

## Introduction

We conducted a follow-up review of the performance audit of the Big Game Drawing System (94P-46). Our primary objective was to determine the implementation status of recommendations made in the October 1995 audit report. To meet our objective we performed the following audit steps:

- Reviewed available computer reports.
- Interviewed department and program management and staff.
- Reviewed Access Control Facility 2 (ACF2) rules.
- Reviewed applicable computer coding.

---

## Follow-up Results

The original audit report contained 16 recommendations to improve the Big Game Drawing System operations. As table 1 shows, the department fully implemented 9 of the recommendations contained in our report.

**Table 1**

**Recommendation Status**

Implemented	9
Being Implemented	3
Partially Implemented	1
Not Implemented	2
Not Applicable	<u>1</u>
Total	<u>16</u>

**Source: Compiled by the Legislative Audit Division.**

Chapter II discusses the implementation status for each recommendation. The report summary from the original report is provided as Appendix A. This summary outlines the original issues and audit recommendations.



# Chapter II - Implementation Status

---

---

## Introduction

The following sections provide information on the implementation status of the recommendations made in the original report. The discussion is categorized into each area where recommendations were made. These areas include:

- Procedures which ensure sportsmen compliance.
- Program administration.
- General and application controls.

---

## Procedures Which Ensure Sportsmen Compliance

### Recommendation #1

We recommend the Department of Fish, Wildlife and Parks electronically compare the revoked privilege information on LED's database to the Big Game Drawing System application information prior to the drawings and hunting seasons.

### Implementation Status

This recommendation is implemented. Programming was written to compare the Law Enforcement Division's revoked privilege information to the Big Game Drawing System database. (A person whose license privileges are forfeited/revoked may not apply for a hunting, fishing, or trapping license or permit during the period when license privileges are revoked.) Information on the systems was compared prior to the 1997 deer, elk and antelope drawings. Birth dates, name, and addressees were compared. Results of the comparison showed 43 people with revoked privileges applied for special licenses/permits. LED staff verified the applicants' privileges were revoked. The applicants were then removed from the big game drawing database prior to the drawings.

### Recommendation #2

We recommend the Department of Fish, Wildlife and Parks modify procedures to produce a more effective means of reviewing landowner preference claims.

### Implementation Status

This recommendation is being implemented but there are no established time frames for implementation. Law Enforcement

## Chapter II - Implementation Status

---

Division is polling the captains, sergeants, and game wardens to determine what information is needed to allow wardens to verify the applicant claiming landowner preference owns the land. The appropriate game warden would investigate those applicants whose ownership claim is questionable.

Once the poll is completed, Licensing staff will have to determine how that information can be gathered and input to the big game drawing database.

---

### Program Administration

#### Recommendation #3

We recommend the Department of Fish, Wildlife and Parks seek legislative clarification with respect to the department's authority to:

- A. Conduct a landowner preference for deer and antelope permits; and
- B. Process applications of those seeking landowner preference differently than those of the general public.

#### Implementation Status

This recommendation is not implemented. During the audit the department did not entirely concur with the recommendation. In the response to the original audit, department officials stated they discussed landowner preference for deer and antelope when legislation for landowner preference for elk was introduced. The department indicated both houses of the legislature intended for the deer and antelope preference to continue. The department's response to the original audit stated "The Department and FWP Commission will further analyze the need for further legislative action."

Since issuance of the Big Game Drawing System audit report, department officials considered the need to seek legislative clarification. The Fish, Wildlife and Parks Commission and department management were advised by department legal staff that the commission and department have the authority to create preferences by rule in the big game drawings and, therefore, legislative clarification is not needed. We still believe the department adopted

the administrative rule for deer and antelope landowner preference without a specific statutory basis.

At the time of the original audit, administrative rules stated the department could accept corrections on applications of those seeking landowner preference. These rules have not been changed. We still believe the department needs statutory authority to process landowners' applications differently than nonlandowners. Again, department legal staff advised the commission and department management the two groups have legal authority to determine by rule, categories or types of errors the department will correct for applicants in their big game drawing applications.

### **Recommendation #4**

**We recommend the Department of Fish, Wildlife and Parks either:**

- A. Comply with the administrative rule prohibiting corrections or changes to applications, or**
- B. Modify administrative rule to reflect current practices and take measures to ensure consistency of its application correction service.**

### **Implementation Status**

**This recommendation is implemented.** In March 1996, the department modified the administrative rules to reflect the practice of making some corrections to special license applications. A procedure manual was developed detailing the kinds of corrections which can be made. The corrections include:

- 1. Adding hunter safety certification numbers.
- 2. Moving valid district choices up to replace invalid choices.
- 3. Eliminating species choices on those applications that are short money when the shortfall is the amount for that species.
- 4. Adjusting party applications to insure party consistency.



## Chapter II - Implementation Status

---

### Big Game Drawing Process

#### Recommendation #5

We recommend the Department of Fish, Wildlife and Parks document procedures for the Big Game Drawing System process.

#### Implementation Status

This recommendation is being implemented. The department is in the process of writing a procedures manual for the drawing processes for nonresident combination licenses and special drawing licenses.

The manual currently includes procedures addressing:

- application dates and deadlines,
- batching and keying applications,
- check and money handling,
- edit correction,
- landowner verification,
- duplicate applications,
- applications without sufficient funds,
- party validation, and
- review of the seven year wait report.

Examples of forms used and reports generated are included in the manual.

#### Recommendation #6

We recommend the Department of Fish, Wildlife and Parks modify procedures so staff no longer handle applications twice when checking for a certificate of competency for nonresidents between the age of 12 and 18.

#### Implementation Status

This recommendation is implemented. If provided by the applicant, licensing staff attach the nonresident hunter education certificate to the back of the application. The certificate number or issuing state, if there is no number, is written on the front of the application and keypunched into the system. An edit occurs when nothing is entered for that field. Staff review the application to determine why the field was empty and either correct the error by filling in the



## Chapter II - Implementation Status

---

appropriate number or state name, or the application is considered in error and removed from the database.

### **Recommendation #7**

**We recommend the Department of Fish, Wildlife and Parks:**

- A. Modify the Seven Year Restriction Report to include additional applicant information; and**
- B. Pursue methods to simplify the review process required for validating parties.**

### **Implementation Status**

**This recommendation is implemented.** The Seven Year Restriction Report now includes the name and address of the person applying for the moose, sheep or goat license in the current year and the name, address and year of the matched person. Staff no longer have to search through microfiche from previous years to find the matched person.

An additional Party Validation Error Report was created which groups records by batch and party record. Staff now know which batch to review when a party is in error.

---

## **General Controls**

### **Recommendation #8**

**We recommend the Department of Fish, Wildlife and Parks establish, test and document a formal disaster recovery plan for the Big Game Drawing System.**

### **Implementation Status**

**This recommendation is not implemented.** The Department of Administration (DofA) scheduled a test of the Big Game Drawing System in May 1997 but DofA did not test the system. FWP planned to use the test to help design and document FWP's formal disaster recovery plan. Since that time, FWP staff responsible for establishing, testing and documenting a formal disaster recovery plan left the department before working on a plan. Current staff have not had time to implement this recommendation.

## Chapter II - Implementation Status

---

The automated licensing system (ALS) approved by the 1997 Legislature will eventually include the big game drawing. The request for proposal for ALS development requires the contractor to conduct at least annual disaster recovery drills. In the interim, department staff have been assigned continued examination and coordination of disaster recovery work.

### **Recommendation #9**

**We recommend the Department of Fish, Wildlife and Parks assign the duties of security officer to an employee who is not a department mainframe applications programmer.**

### **Implementation Status**

**This recommendation is implemented.** The person now assigned security officer duties is responsible for the department's network operating systems. The person has limited access to the mainframe computer and is only used as a mainframe programmer in case of an emergency.

### **Recommendation #10**

**We recommend the Department of Fish, Wildlife and Parks establish procedures:**

- A. For an independent review of ACF2 reports.**
- B. To ensure a timely, comprehensive review of ACF2 reports.**

### **Implementation Status**

**This recommendation is no longer applicable.** Since issuance of the original report, FWP separated the duties of the security officer and mainframe programmers, removing an organizational risk. We also re-evaluated the purpose of the second review and whether reviewing ACF2 reports provides adequate control over security officer activities. Our evaluation showed there is no effective way to track security officer activities. ACF2 reports will not show if a security officer changed a data set or program for personal gain.

## Chapter II - Implementation Status

---

Since this issue applies to all agencies, the Legislative Audit Division will explore this further in its annual Central Reviews audit. At that time, procedures will be established for auditors to follow when examining the risks associated with individual agency mainframe computer applications and the location of security officer position within each agency.

### **Recommendation #11**

**We recommend the Department of Fish, Wildlife and Parks log access by department technical support staff and the bureau chief to the on-line error correction and address change screens.**

### **Implementation Status**

**This recommendation is implemented.** Access by department technical support staff and the bureau chief is now logged when they use the on-line correction and address change screens.

### **Recommendation #12**

**We recommend the Department of Fish, Wildlife and Parks develop formal policies and procedures for internal evaluations of security in accordance with state law.**

### **Implementation Status**

**This recommendation is being implemented.** The bureau chief has developed general categories for needed policies, such as documentation, software, hardware, asset management, and forms management. Data processing staff have commented on those categories and drafts are being written.

---

## Application Controls

### **Recommendation #13**

**We recommend the Department of Fish, Wildlife and Parks rectify the problem of the coding not identifying invalid prerequisite elk license numbers.**

## Chapter II - Implementation Status

---

### Implementation Status

**This recommendation is implemented.** Until the applicable coding was found a supplementary program was written which checked for the appropriate prerequisite elk license numbers. Prior to the 1997 deer, elk and antelope drawing the applicable coding was found and modified so the main program now checks for appropriate numbers.

### Recommendation #14

**We recommend the Department of Fish, Wildlife and Parks establish a formal system for logging permits and licenses in and out of the cage and the use of the permits or licenses - printed, voided, used as samples, etc.**

### Implementation Status

**This recommendation is implemented.** A notebook was created containing a page for each type of drawing license/permit issued. Each page shows the sequence numbers of the forms initially put into the vault. The person taking the licenses/permits/tags out of the vault indicates on the page:

- the date the forms were removed,
- the quantity removed,
- the sequence number of the forms, and
- how the forms were used (printed for a drawing, voided, used as samples, etc.).

### Recommendation #15

**We recommend the Department of Fish, Wildlife and Parks update documentation of the Big Game Drawing System computer application to reflect the current environment.**

### Implementation Status

**This recommendation is partially implemented.** Some changes were made to program narratives to reflect the current environment, but more changes are needed. For example, deer and elk narratives still do not address landowner preference.

### **Recommendation #16**

**We recommend the Department of Fish, Wildlife and Parks develop a formal system to document, test/review and approve enhancements to the Big Game Drawing System.**

### **Implementation Status**

**This recommendation is implemented.** Two procedures are used to document changes to the Big Game Drawing System. Electronic mail is used for requests with minor changes to the system (requests for yearly table updates, mailing label printing, etc.). The request and request's resolution, along with time and date information, are printed and filed for reference.

An enhancement request form is used for larger enhancements (legislative mandates, major program changes, etc). This form requires:

1. The signature of the person requesting the enhancement and date requested.
2. The signature of the person completing the enhancement and the date completed.
3. The signature of the person verifying the enhancement was completed and the date verified.



## Agency Response

---

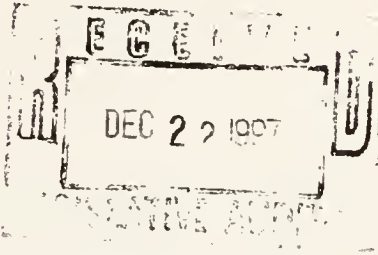






# Montana Fish, Wildlife & Parks

P. O. Box 200701  
Helena, MT 59620-0701  
(406) 444-3186  
FAX: 406-444-4952  
Ref: PG0691.97  
December 19, 1997



Jim Pelligrini  
Deputy Legislative Auditor  
Room 135  
State Capitol Building  
Helena, MT 59620

Dear Mr. Pelligrini:

Thank you for the thorough manner in which the Legislative Auditor's office conducted the original audit of the Big Game Drawing System, as well as the subsequent follow-up. In addition, we wanted to express appreciation for your recognition of our commitment to the implementation of your original recommendations. For those recommendations which you have classified as *implemented, in progress* (13 of 16), FWP will continue to consider methods for improvement or pursue completion. This response will focus on those recommendations that you have classified as not implemented.

## Recommendation # 3

We recommend the Department of Fish, Wildlife and Parks seek legislative clarification with respect to the department's authority to:

1. Conduct a landowner preference for deer and antelope permits, and
2. Process applications of those seeking landowner preference differently than those of the general public.

## Agency Response

This is an issue on which our legal staffs disagree. However, the Fish, Wildlife and Parks Commission directed the department to implement a comprehensive statewide preference system for the year 2001. This action will require legislative action by the 1999 legislative session. The department will consider clarifying the statutes to address this audit recommendation at that time.

## Recommendation #8

We recommend the Department of Fish, Wildlife and Parks establish, test, and document a formal disaster recovery plan for the Big Game Drawing System.

## Agency Response

Since the original audit report, some preliminary work was done in conjunction with the Information Services Division (ISD) at the Department of Administration. Any newly created plan for the existing system would be "interim" because an automated licensing project is underway. This project will eventually replace the Big Game drawing system. Included within the RFP is a requirement for disaster recovery planning and testing on the part of the contractor.

Thank you for the opportunity to comment.

Sincerely,

Patrick J. Graham  
Director



## Appendix A

---



# 1995 Audit Report Summary

---

---

## Introduction

Sportsmen wishing to hunt in Montana receive big game hunting licenses and permits through: 1) over-the-counter purchases, and 2) special random drawings. Each year the Department of Fish, Wildlife and Parks (FWP) conducts random drawings for hunting licenses and permits for moose, sheep, mountain goat, deer, elk and antelope. This performance audit examined the Big Game Drawing System. The primary objective of this audit was to determine the fairness of the big game permit and license drawing process.

---

## Background

Permits and licenses issued through the Big Game Drawing System must be used in conjunction with a valid resident conservation or sportsman license, or nonresident conservation or combination license. To obtain an elk permit through the annual drawing a resident also needs a valid prerequisite elk license.

---

## Applications Submitted to FWP

In 1994 over 100,000 people submitted applications for moose, sheep, goat, deer, elk and antelope licenses and permits. Approximately 200,000 individual species applications were submitted for 106,799 licenses or permits.

---

## Applications Processed for Inclusion in Computer Database

Computer programs are used to conduct the big game drawings. The Special Licensing Section, Licensing and Data Processing Bureau, FWP processes applications for the big game drawings. A number of manual edits are performed prior to inputting the information into the computer. Before the database is updated, the application information is processed through a number of drawing system edits. If the errors cannot be corrected by section staff the application information is put in a separate file and the applicant is refunded a portion of the application fee. Those applications which are corrected and/or error free are uploaded to the database.

## 1995 Audit Report Summary

---

---

### Game Limits Placed on Certain Applicants

Nonresidents are limited to, but not guaranteed, 10 percent of a district quota. Up to 15 percent of elk, antelope, deer and deer B permits in each hunting district are available for residents and nonresidents claiming landowner preference.

---

### Drawing Conducted

There are a series of four drawings for deer, elk and antelope permits. The first drawing is for restricted landowner preference. The second drawing is for the unrestricted landowner preference; this drawing allows for nonresident landowner selection when all resident landowners are selected. The restricted regular drawing follows the two landowner drawings. The unrestricted regular is the fourth drawing. In this drawing the 10 percent nonresident restriction is lifted.

There are only two drawings for moose, sheep and goat since there is no landowner preference for these species. The two drawings are restricted regular and unrestricted regular.

---

### Is The Drawing For Licenses And Permits Fair?

The drawing process has two items which intentionally affect the "randomness" of the drawing; the landowner preference procedures and the up to 10 percent nonresident restriction. These items are based on legislative action and administrative rules.

The computer programs used to conduct the big game drawing eliminate any "human bias" by relying on random events to select successful applicants. These are:

1. The selection process, which also assigns drawing numbers to each person applying for each species.
2. Actual drawing of applicants for licenses and permits using random numbers.

---

### ***Conclusion: Computerized Big Game Drawing is Fair and Random***

The computerized drawing process is fair and random. The computerized drawing ensures everyone has a unique drawing number and has an equal chance of selection for a permit or license within a district for a given choice. The use of database files, assigning drawing numbers using the database, and the matching of drawing numbers with randomly generated numbers provides for a random drawing process.

---

### **Procedures Which Ensure Sportsmen Compliance**

Montana laws, administrative rules and hunting regulations establish many compliance requirements which relate to the random drawings for big game hunting permits and licenses. Overall, the process the department established for reviewing compliance assures sportsmen adhere to those laws and rules. However, we did identify areas for improvement related to hunters with revoked privileges and the landowner preference drawing.

---

### **Hunters With Revoked Privileges**

Statutes prohibit a person whose license privileges are forfeited from applying for a hunting license. Although the department established a process for identifying persons with revoked privileges who apply for special licenses or permits, this process could be improved. The department could conduct an electronic comparison of the Big Game Drawing System database and Law Enforcement Division database. Conducting this comparison prior to the special drawings would ensure permits are not awarded to persons with revoked privileges.

---

### **Landowner Preference Drawing**

Applicants must meet, and department staff must monitor, several requirements related to eligibility for landowner preference. Controls over landowner preference compliance could be improved. Currently, compliance monitoring is a joint effort by Special Licensing Section staff and the department's game wardens. Discussion with game wardens indicated they are not always able to complete their review of compliance with landowner preference provisions. Part of this problem is due to the fact the department must verify landownership rather than the applicant submitting proof. This makes it a time consuming task. It would be beneficial for the department to review procedures to determine the most effective means of reviewing landowner preference claims.



## 1995 Audit Report Summary

---

---

### **Program Administration**

During our review of the Big Game Drawing System, we conducted a limited review of various aspects of program administration. Several areas were identified pertaining to administration and efficiency of operations which could be improved.

---

### **Legislative Clarification Needed for Landowner Preference**

In 1987, the legislature established a preference for landowners in the special elk permit drawing. This was the first time the legislature specifically authorized landowner preference. In 1973, the department created a preference for landowners in the drawings for antelope, deer and deer B permits through administrative rule. We believe the department has exceeded its statutory authority in establishing a preference for landowners in the deer and antelope drawings. In addition, the administrative rule used by the department to establish landowner preference for deer and antelope permits cites a code section which does not clearly grant the department authority to adopt this rule. It appears the department adopted an administrative rule without a specific statutory basis.

### **Other Administrative Rules Treat Groups of Applicants Differently**

The department processes landowner applications differently than those of the general public. Department staff review all applications for errors or omissions. Landowners are then contacted and allowed to correct their applications. The department established this process through administrative rule. The general public is not given an opportunity to correct any errors or omissions. We believe the department needs statutory authority to process landowners' applications differently than non-landowners. Nothing in the sections of law establishing a landowner preference drawing allows the department to establish different application processing procedures for landowners.

### **Department Should Seek Legislative Clarification**

If the department wishes to continue granting preference for landowners seeking deer and antelope permits, it should seek legislative clarification of this authority. In addition, if the department continues the practice of accepting corrections from applicants seeking landowner preference, the department should seek legislative clarification of this authority.



## 1995 Audit Report Summary

---

---

### **Correcting Big Game Applications**

The department established a procedure for correcting some errors and omissions on applications for licenses and permits. This practice is contrary to the department's administrative rules which prohibit corrections or changes to applications once the department receives them. In addition, the correction service varies between staff members and is affected by the amount of time available to perform error correction.

The department should either comply with the administrative rule prohibiting corrections or change the rule to reflect the department's current practices. If the department is going to continue its practice of correcting applications, the department needs to take measures to ensure a consistent level of service is provided in correcting big game applications.

---

### **Procedure Manual Needed**

There is no comprehensive procedure manual relating to administration and processing of the big game drawings. Department operations could be enhanced by documenting procedures for the Big Game Drawing System process.

---

### **Nonresident Youth Applications Handled Twice**

Statutes establish requirements for issuing hunting permits and licenses to persons between the ages of 12 and 18. Applicants who fall into this age range must present a certificate of competency for safe handling of firearms or a bow hunter education course. The process the department uses to verify compliance with this requirement could be more efficient. Modifying the application would reduce the staff time involved in verifying compliance.

---

### **Edit Reports Could be Modified**

Department staff use a number of edit reports to monitor compliance with various provisions governing the special hunting permits and licenses drawing. Providing additional information on two reports could make them more useful for department staff. These reports are used to monitor compliance with: 1) the seven year wait in applying for a moose, sheep or mountain goat permits, and 2) applying for antelope or elk permits as a party.

## 1995 Audit Report Summary

---

---

### General Controls

We examined computer controls pertaining to physical security and electronic access to the big game drawing computer application. Although some controls need improvement, nothing came to our attention indicating there were improprieties in the data.

---

### Physical Security Controls

It is FWP's responsibility to ensure a viable and tested recovery plan is in effect for its big game drawing computer application. FWP does not have a formal disaster recovery plan. Without a formal disaster recovery plan, FWP may be unable to process permits, licenses and refunds resulting from the Big Game Drawing System should the state's mainframe computer become inoperable.

A disaster recovery plan also ensures system documentation is stored off-site in case of disaster. At the time of our audit hardcopy documentation covering all aspects of the drawings were maintained in a room at the main FWP building in Helena.

The Department of Fish, Wildlife and Parks should establish, test, and document a formal disaster recovery plan for the Big Game Drawing System.

---

### Electronic Access Controls

Proper electronic access controls prevent and detect deliberate or accidental errors caused by improper or unauthorized use or changes of data and/or programs. FWP uses an access control software called Access Control Facility-2 (ACF2).

Prior to finalization of the audit the department implemented two recommendations. Through ACF2 rules, the department is now:

1. Controlling files to prevent unauthorized access by FWP employees who are mainframe users.
2. Logging access to changes in production programs and data by technical support staff.

Other access controls could be improved in the following areas:

1. Separating duties of the security officer and programmer functions.

2. Establishing procedures for an independent and timely, comprehensive review of ACF2 reports.
3. Logging access of department technical support staff and the bureau chief to the on-line error correction and address change screens.
4. Developing formal policies and procedures for internal evaluations of security in accordance with state law.

---

### Applications Controls

We examined input, processing and output controls over Big Game Drawing System computer applications. System documentation and enhancement requests were also reviewed. Overall, input, processing and output controls were in place and functioning. Although some controls need improvement, nothing came to our attention indicating there were improprieties in the data.

---

### Input Controls

Four of the five input control areas reviewed are in place and functioning so as to provide assurance:

1. Only properly authorized and approved information is input.
2. Conversion of data to the mainframe computer, and thus to a machine-sensible form, is controlled.
3. Movement of data to the data entry vendor and the mainframe is controlled.
4. Errors detected by the application system and the resubmission of corrected transactions are reviewed and controlled.

We found edits which check for a correct prerequisite elk license number were not functioning properly and need to be tested.

---

### Processing Controls

The two processing control areas reviewed are in place and functioning so as to provide assurance:

1. All valid applications are processed and the same applications are not processed more than once.
2. Unreasonable input is not processed.

## 1995 Audit Report Summary

---

---

### Output Controls

The two output control areas reviewed are in place and functioning so as to provide assurance:

1. The correct number of applications were processed and all permits or licenses were printed.
2. Output is distributed to successful applicants and district offices.

---

### Controls Over Permit and License Stock

Big game drawing permit and license stock is maintained in a locked cage in the main FWP building. One person controls the key to the cage and a limited number of people are allowed to remove stock from the cage. When stock is removed the permit or license sequence numbers and reason for removal are recorded in a stenographer book. At year's end notes in the book are typed and eventually destroyed.

We compared the 1994 typed log to the number of successful applicants in the big game drawings. The log indicated stock for 13 more antelope permits were printed than there were successful applicants, and stock for five less deer B permits were printed than successful applicants. The typed list did not show any stock used for 3,672 applicants recorded as successful for A-7 elk permits.

We believe a permanent log book maintained in the cage, and a yearly reconciliation of stock used to the number of permits and licenses printed would alleviate the types of problems noted above.

---

### System Documentation

Documentation of a computer system should reflect the working environment. Documentation for the Big Game Drawing System was created about 1980. During our review of system narrative and programming it was sometimes difficult to determine how the system actually operated. Anyone else trying to learn the system would have the same problems, especially if the current programmer is not available to help answer questions and explain procedures. For example, currently there is no documentation of the random number generator subroutine used in the drawing.

We believe FWP should update documentation of the Big Game Drawing System computer application to reflect the current environment.

---

### Enhancement Requests

Changes are made to the Big Game Drawing System each year. These system changes were not always documented well in the program. These include changing sequence numbers of valid licenses, some district information for specific species, valid birthdates, etc. Changes in legislation also require changes in program code. There is no formal system for changes to be requested, made and verified. Notes and memos are routed to programming staff who then make changes. There is no formal system to ensure appropriate changes were made or made in a timely manner.

Enhancements requests to a computer system should be formally documented. Changes should be tested/reviewed and approved by the requestor prior to being moved into production. Changes should also be documented within the program and hardcopy documentation.





